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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**MOTORS LIQUIDATION COMPANY
et al., f/k/a General Motors Corp., et al.,**

Debtors.

Chapter 11

Case No. 09-50026(REG)

(Jointly Administered)

**CREDITORS FLEXTRONICS MANUFACTURING (SHANGHAI) COMPANY, LTD AND
FLEXTRONICS INTERNATIONAL, LTD. RESPONSE TO DEBTORS'
OBJECTION TO RECLAMATION CLAIM**

Creditors Flextronics Manufacturing (Shanghai) Company, Ltd., and Flextronics International, Ltd. (hereinafter collectively “Flextronics”) filed a Reclamation Demand in the amount of \$33,472.22 on June 11, 2009. The Debtor acknowledges receipt of the Reclamation Demand and object to the Reclamation Claim on the basis that: 1) the shipments subject to the Reclamation Claim have been “assumed, assigned or satisfied” by the Debtor; and, 2) the Debtor further claims that the Reclamation Claim is subject to a senior security interest in the same goods

which nullifies the effect of the Reclamation Claim.

Flextronics hereby responds that it has **not been paid** for any of the items subject to the Reclamation Claim and puts the Debtor to its burden of proof with respect to the other issues raised in its Objection.

Dated: New York, New York
October 15, 2009

WHITE AND WILLIAMS, LLP

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